

1
2
3
4
5
6
7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 PROMEDEV, LLC dba RELIEF FACTOR,

11 Plaintiff,

12 v.

13 AGE RELIEF, LLC; and MICHAEL JOSEPH
14 REDMOND,

15 Defendants.

16 CASE NO. 2:22-cv-01824-RSM

17 **FOURTH STIPULATION AND ORDER
18 TO EXTEND TIME TO RESPOND TO
19 COMPLAINT**

20 Plaintiff Promedev, LLC dba Relief Factor (“Plaintiff”) and defendants Age Relief, LLC
21 and Michael Joseph Redmond (“Defendants”) (collectively, the “Parties”), by and through their
22 respective counsel, hereby stipulate and agree as follows:

23 WHEREAS, Plaintiff filed its Complaint on December 28, 2022;

24 WHEREAS, on February 23, 2023, the Court granted the Parties’ Third Stipulation and
25 Order to Extend Time to Respond to Plaintiff’s Complaint [Dkt. # 13];

26 WHEREAS, Defendants’ response to Plaintiff’s complaint is due on March 17, 2023;

27 WHEREAS, the Parties have been working cooperatively regarding the early stages of the
28 litigation, continue to be engaged in substantial discussions of the matters at issue in this dispute,
29 and have commenced meaningful settlement discussions and exchanges;

30 WHEREAS, Defendant’s lead counsel, Mr. Kit Roth, on behalf of Defendant, has been
31 uniquely engaged with Plaintiff’s counsel on meaningful settlement discussions and exchanges;

1 WHEREAS, Mr. Roth is currently on bereavement leave because, last week, Mr. Kit
2 Roth's mother recently passed away suddenly and unexpectedly,

3 WHEREAS, to facilitate the Parties' ongoing settlement discussions and allow Mr. Roth
4 bereavement time, the Parties agree to extend the deadline by which Defendants may respond to
5 the Complaint to March 31, 2023;

6 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED TO BY THE PARTIES,
7 that Defendants may have until March 31, 2023 to file and serve a response to the Complaint.

8 RESPECTFULLY SUBMITTED on this 13th day of March, 2023.
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

1 **GOLDFARB & HUCK ROTH RIOJAS, PLLC**

2 /s/Kit W. Roth

3 Kit W. Roth, WSBA No. 33059

4 /s/R. Omar Riojas

5 R. Omar Riojas, WSBA No. 35400

6 925 Fourth Avenue, Suite 3950

7 Seattle, WA 98104

8 Telephone: 206.452.0260

9 Facsimile: 206.397.3062

10 E-mail: roth@goldfarb-huck.com

11 riojas@goldfarb-huck.com

12 Attorneys for Defendants

13 **LOWE GRAHAM JONES PLLC**

14 s/ David A. Lowe

15 David A. Lowe, WSBA No. 24453

16 1325 Fourth Ave., Suite 1130

17 Seattle, WA 98101

18 Telephone: (206) 381-3300

19 Email: lowe@lowegrahamjones.com

20 Attorneys for Plaintiff

ORDER

Pursuant to the above stipulation, **IT IS SO ORDERED.**

DATED this 13th day of March, 2023.

[Signature]

RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE